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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN JOSE DIVISION**
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12 UNITED STATES OF AMERICA,
13 Plaintiff,
14
15 v.
16 RAGINI VECHAM, et al.,
17 Defendants.

Case No.: CR 15-0427 BLF

**JOINT STIPULATION AND ~~[PROPOSED]~~ ORDER
RE STATUS CONFERENCE**

18 The United States, through its counsel Assistant United States Attorney Timothy J.
19 Lucey, and defendant Ragini Vecham, through her counsel Nanci Clarence and Josh Cohen,
20 defendant Kishore Pallapothu through his counsel Mary McNamara and Edwin Prather,
21 defendant Tota through his counsel Ethan Atticus Balogh and defendant Ramana Reddy
22 through his counsel Izzy Ramsey, hereby agree and stipulate to a continuance in this case
23 from Tuesday, December 8, 2015 to Tuesday, January 26, 2016, at 9:00 a.m. before this
24 Court.

25 This continuance is requested for the following:

1 The government provided a substantial amount of evidence to defense counsel
2 consisting of almost one terabyte of electronic information. The parties are continuing to
3 discuss additional items of discovery. Additional time is needed for the defense to review and
4 evaluate the discovery provided, consider additional investigation and discovery requests, and
5 make informed decisions regarding case strategy.

6 For these reasons, the parties respectfully request that the Court continue the status
7 conference in this case from December 8, 2015 to January 26, 2016, at 9:00 a.m. The parties
8 stipulate that the time period from December 8, 2015 through January 26, 2016 should be
9 excluded under the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(iv) in the
10 interest of justice to permit effective defense investigation and preparation, and specifically to
11 allow time for the defense to evaluate the discovery provided, consider additional investigation
12 and discovery requests, and make an informed decision regarding the course of the case.

13 SO STIPULATED.

14 BRIAN J. STRETCH
15 Acting United States Attorney

16 Dated: December 2, 2015

17 _____/s/_____
18 TIMOTHY LUCEY
19 Assistant United States Attorney

20 Dated: December 2, 2015

21 _____/s/_____
22 Nanci CLARENCE
23 JOSH COHEN
24 Attorneys for Defendant
25 RAGINI VECHAM

1
2 Dated: December 2, 2015

_____/s/_____
MARY MCNAMARA
EDWIN PRATHER
Attorneys for Defendant
KISHORE PALLAPOTHU

5
6 Dated: December 2, 2015

_____/s/_____
ETHAN A. BALOGH
Attorney for Defendant
SATYANARAYANA TOTA

9
10 Dated: December 2, 2015

_____/s/_____
IZZY RAMSEY
Attorney for Defendant
RAMANA REDDY

13
14 **~~[PROPOSED]~~ ORDER**

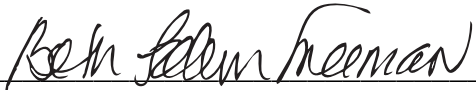
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16 GOOD CAUSE APPEARING and per the parties' stipulation, IT IS HEREBY ORDERED
17 that a continuance in this case is granted from December 8, 2015 to January 26, 2016, at 9:00
18 a.m. before this Court. The Court finds that the ends of justice that will be served by granting a
19 continuance outweigh the best interests of the public and the defendant in a speedy trial, and
20 that for the reasons stated in the stipulation, i.e., the need for additional time for effective
21 defense investigation and preparation, and specifically for the defense to evaluate the
22 discovery provided, consider additional investigation and discovery requests, and make an
23 informed decision regarding the course of the case, an exclusion of time is appropriate.

24 Accordingly, IT IS HEREBY ORDERED that, for the reasons stated in the stipulation,
25 the time within which the trial of this matter must be commenced under the Speedy Trial Act is

1 EXCLUDED during the time period from December 8, 2015, through January 12, 2016,
2 pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(iv), due to the need for additional
3 time to permit effective defense investigation and preparation for the above-stated reasons,
4 and in the interests of justice.

5 IT IS SO ORDERED.

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7 Dated: Ö^&{ à^!AôGFI


HONORABLE BETH L. FREEMAN
UNITED STATES DISTRICT JUDGE